State of Utah

JON M. HUNTSMAN, JR.
Governor

GARY HERBERT
Lieutenant Governor

Department of
Environmental Quality

William J. Sinclair
Acting Executive Director

DIVISION OF AIR QUALITY
Cheryl Heying
Director

DAQE-IN0120730005-09

January 29, 2009

Kevin Rice
ShawCor Pipe Protection LLC
1750 North Pioneer Ln.
P.O. Box 1958
Vineyard, UT 84059

Dear Mr. Rice:

Re: Intent to Approve: Addition of Portable Concrete Coating Plant to Existing Corrosion-Coated Pipe Manufacturing Plant ; Utah County; CDS B; NSR
Project Number: N012073-0005

The attached document is the Intent to Approve for the above-referenced project. The Intent to Approve is subject to public review. Any comments received shall be considered before an Approval Order is issued. The Division of Air Quality is authorized to charge a fee for reimbursement of the actual costs incurred in the issuance of an Approval Order. An invoice will follow upon issuance of the final Approval Order.

Future correspondence on this Intent to Approve should include the engineer's name as well as the DAQE number as shown on the upper right-hand corner of this letter. The project engineer for this action is Maung Maung, who may be reached at (801) 536-4153.

Sincerely,

John T. Blanchard, Manager
Minor New Source Review Section

JTB:MM:sa

cc: Utah County Health Department

STATE OF UTAH

Department of Environmental Quality

Division of Air Quality

INTENT TO APPROVE: Addition of Portable Concrete Coating Plant to Existing Corrosion-Coated Pipe Manufacturing Plant

Prepared By: Maung Maung, Engineer
Phone: (801) 536-4153
Email: mmaung@utah.gov

INTENT TO APPROVE NUMBER

DAQE-IN0120730005-09

Date: January 29, 2009

Geneva Pipe Coating Facility

Source Contact:
Mr. Kevin Rice
Environmental and Safety Coordinator
Phone: (281) 886-2333

John T. Blanchard, Manager
Minor New Source Review Section
Utah Division of Air Quality

ABSTRACT

ShawCor Pipe Protection, LLC has requested to modify its existing Approval Order, DAQE-203-02 to add a portable concrete coating plant. The proposed plant applies concrete coating to corrosion-coated pipe that will be used in the construction of transmission pipelines. The source is located in Utah County which is a nonattainment area of the NAAQS for PM_{10}. NSPS and NESHAP regulations do not apply to this source. Title V of the Clean Air Act does not apply to this source. The emissions, in tons per year, will change as follows: PM_{10} = 0.31, VOC = 3.74. The changes in emissions will result in the following, in tons per year, potential to emit totals: PM_{10} = 13.31, SO_2 = 5.0, NO_x = 5.0, CO = 5, VOC = 18.74, total HAPs = 15.

The NOI for the above-referenced project has been evaluated and has been found to be consistent with the requirements of UAC R307. Air pollution producing sources and/or their air control facilities may not be constructed, installed, established, or modified prior to the issuance of an AO by the Executive Secretary of the Utah Air Quality Board.

A 30-day public comment period will be held in accordance with UAC R307-401-7. A notification of the intent to approve will be published in The Daily Herald on February 3, 2009. During the public comment period the proposal and the evaluation of its impact on air quality will be available for the public to review and provide comment. If anyone so requests a public hearing, it will be held in accordance with UAC R307-401-7. The hearing will be held as close as practicable to the location of the source. Any comments received during the public comment period and the hearing will be evaluated. The proposed conditions of the AO may be changed as a result of the comments received.

Name of Permittee:

ShawCor Pipe Protection LLC
1750 North Pioneer Ln.
P.O. Box 1958
Vineyard, UT 84059

Permitted Location:

ShawCor Pipe Protection LLC: Geneva Pipe Coating Facility
1750 N. Pioneer Ln.
Vineyard, UT 84058

UTM coordinates:435,100 m Easting, 4,464,200 m Northing
SIC code: 3084 (Plastic Pipe)

Section I: GENERAL PROVISIONS

I.1 All definitions, terms, abbreviations, and references used in this AO conform to those used in the UAC R307 and 40 CFR. Unless noted otherwise, references cited in these AO conditions refer to those rules. [R307-101]

I.2 The limits set forth in this AO shall not be exceeded without prior approval. [R307-401]

I.3 Modifications to the equipment or processes approved by this AO that could affect the emissions covered by this AO must be reviewed and approved. [R307-401-1]

I.4 All records referenced in this AO or in other applicable rules, which are required to be kept by the owner/operator, shall be made available to the Executive Secretary or Executive Secretary's representative upon request, and the records shall include the two-year period prior to the date of the request. Unless otherwise specified in this AO or in other applicable state and federal rules, records shall be kept for a minimum of two (2) years. [R307-401]

I.5 At all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate any equipment approved under this AO, including associated air pollution control equipment, in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Executive Secretary which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source. All maintenance performed on equipment authorized by this AO shall be recorded. [R307-401-4]

I.6 The owner/operator shall comply with R307-150 Series. Inventories, Testing and Monitoring. [R307-150]

I.7 The owner/operator shall comply with UAC R307-107. General Requirements: Unavoidable Breakdowns. [R307-107]

Section II: SPECIAL PROVISIONS

II.A The approved installations shall consist of the following equipment:

II.A.1 **Pipe manufacturing plant**
Plant wide

II.A.2 **Stockpile #1**
Sand Stockpile

II.A.3 **Stockpile #2**
Aggregate stockpile

II.A.4 **Hopper #1**
Sand mixer hopper

II.A.5 **Hopper #2**
Cement mixer hopper

II.A.6 **Conveyor #1**
Dry mix conveyor

II.A.7 **Central mix #1**
Central mix dump

II.A.8 **Coating process #1**
Fusion bond pipe coating

II.A.9 **Coating process #2**
Entec pipe coating process

II.A.10 **Coating process #3**
Powercrete coating process

II.A.11 **Coating process #4**
Polyurethane foam pipe coating process

II.A.12 **Tanks**
Miscellaneous storage tamks

II.A.13 **Mixer #2**
Aggregate mixer hopper

II.A.14 **Silo #1**
Cement silo with a baghouse, make and model

II.B Requirements and Limitations

II.B.1 **Requirements and Limitations**

II.B.1.a The Company shall notify the Executive Secretary in writing when the installation of the portable concrete coating plant has been completed and is operational. To insure proper credit when notifying the Executive Secretary, send your correspondence to the Executive Secretary, attn: Compliance Section.

If construction and/or installation has not been completed within 18 months from the date of this AO, the Executive Secretary shall be notified in writing on the status of the construction and/or installation. At that time, the Executive Secretary shall require documentation of the continuous construction and/or installation of the operation and may revoke the AO. [R307-401-18]

II.B.1.b Visible emissions from any stationary point or fugitive emission source associated with the source or with the control facilities shall not exceed 20% opacity. Opacity observations of emissions from stationary sources shall be conducted in accordance with 40 CFR 60, Appendix A, Method 9. [R307-401]

II.B.1.c All unpaved roads and other unpaved operational areas that are used by mobile equipment shall be water sprayed and/or chemically treated to control fugitive dust. The application of water or chemical treatment shall be used. Treatment shall be of sufficient frequency and quantity to maintain the surface material in a damp/moist condition or unless it is below freezing. The opacity shall not exceed 20% during all times the areas are in use. If chemical treatment is to be used, the plan must be approved by the Executive Secretary. Records of water and/or chemical treatment shall be kept for all periods when the plant is in operation. The records shall include the following items:

A. Date

B. Number of treatments made, dilution ratio, and quantity

C. Rainfall received, if any, and approximate amount

D. Time of day treatments were made

E. Records of temperature if the temperature is below freezing. [R307-205-1]

II.B.1.d The sulfur content of any fuel oil or diesel burned shall not exceed 0.5 percent by weight. The sulfur content shall be determined by ASTM Method D 4294 89 or an approved equivalent. The sulfur content shall be tested if directed by the Executive Secretary. [R307-203-1]

II.B.1.e The plant wide emissions of VOCs and HAPs from the spray booths, parts, cleaners, etc., and associated operations shall not exceed:

15.00 tons per rolling 12-month period for VOCs
9.9 tons per rolling 12-month period for any individual HAP
15.00 tons per rolling 12-month period for all HAPs combined

The Value shall not be exceeded without prior approval. Compliance with each limitation shall be determined on a rolling 12-month total. Based on the twentieth day of each month, a new 12-month total shall be calculated using data from the previous 12 months. The plant wide emissions of VOCs and HAPs emitted to the atmosphere shall be determined by maintaining a record of VOC and HAP potential contained in materials used each month. The record shall include the following data for each item used:

1. Name of the VOC and HAPs emitting materials, such as: coatings, solvent, chemical compounds, etc.

2. The weight and use location (name of booth or plant facility) of the VOC potential and HAP potential of the material(s) listed in 1.

3. Percent by weight of all VOC potential and HAP potential for each individual material listed in 1. The percent by weight of the VOC and HAP potentials can be obtained from the manufacturers' MSDS. The owner/operator can obtain MSDS data from the manufacturers of the materials and retain the information on-site.

4. Amount and location of materials containing VOCs and HAPs used on a monthly basis and summed for every location and for the entire plant each month.

5. To calculate the above potentials contained in the materials listed in 4., use the following procedure:

VOC or HAP = (% Volatile by Weight)/100 x (Density lb/gal) x Gal used x (1ton / 2000 lb)

6. The amount of VOC content potential (potential air emissions) and HAP potential (potential air emissions) in pounds contained in materials deposited as solid or hazardous waste for the month shall be quantified and subtracted from the quantities calculated above. This is done to allow quantification by the source of the total VOCs and HAPs emissions. The assumption is that all the two above-potentials of the materials applied to a product evaporate and are therefore considered emissions.

7. VOC emissions from other operations. The sum of the VOCs emissions from all listed sources combined with the sum of the potential of the materials calculated in 6. above shall not exceed the total. [R307-401]

II.B.1.f A manometer or megnehelic pressure gage shall be installed to measure the differential pressure across the fabric filters. Static pressure differential across the fabric filter shall be between 15 to 20 inches of water column. The pressure gage shall be located such that an inspector/operator can safely read the indicator at any time. The reading shall be accurate to within plus or minus 1.0 inch of water column. The instrument shall be calibrated annually. [R307-401]

II.B.1.g A manometer or magnehelic pressure gage shall be installed to measure the differential pressure across the cartridge dust collectors. Static pressure differential across cartridge dust collectors shall be 1 to 6 inches of water column. The pressure gage shall be located such that an inspector/operator can safely read the indicator at any time. The reading shall be accurate to within plus or minus 1.0 inch of water column. The instrument shall be calibrated annually. [R307-401]

PERMIT HISTORY

The final AO will be based on the following documents:

Is Derived From	NOI submitted on August 11, 2008 dated
Replaces	DAQE-203-02 dated March 13, 2002

ACRONYMS

The following lists commonly used acronyms and their associated translations as they apply to this document:

40 CFR	Title 40 of the Code of Federal Regulations
AO	Approval Order
ATT	Attainment Area
BACT	Best Available Control Technology
CAA	Clean Air Act
CAAA	Clean Air Act Amendments
CDS	Classification Data System (used by EPA to classify sources by size/type)
CEM	Continuous emissions monitor
CEMS	Continuous emissions monitoring system
CFR	Code of Federal Regulations
CO	Carbon monoxide
COM	Continuous opacity monitor
DAQ	Division of Air Quality (typically interchangeable with UDAQ)
DAQE	This is a document tracking code for internal UDAQ use
EPA	Environmental Protection Agency
HAP or HAPs	Hazardous air pollutant(s)
ITA	Intent to Approve
MACT	Maximum Achievable Control Technology
NAA	Nonattainment Area
NAAQS	National Ambient Air Quality Standards
NESHAP	National Emission Standards for Hazardous Air Pollutants
NOI	Notice of Intent
NO_x	Oxides of nitrogen
NSPS	New Source Performance Standard
NSR	New Source Review
PM_{10}	Particulate matter less than 10 microns in size
$PM_{2.5}$	Particulate matter less than 2.5 microns in size
PSD	Prevention of Significant Deterioration
R307	Rules Series 307
R307-401	Rules Series 307 - Section 401
SO_2	Sulfur dioxide
Title IV	Title IV of the Clean Air Act
Title V	Title V of the Clean Air Act
UAC	Utah Administrative Code
UDAQ	Utah Division of Air Quality (typically interchangeable with DAQ)
VOC	Volatile organic compounds